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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

July 16, 2003

In re Application of: Caldwell et al
 Serial No. 09/761,604
 Filed: January 16, 2001
 For: NATURAL LANGUAGE PRODUCT COMPARISON GUIDE
 SYNTHESIZER
 Examiner: Kindred, Alford W
 Art Unit: 2177
 Confirmation Number: 5820
 Attorney Docket No.: CO2-2

HONORABLE COMMISSIONER OF PATENTS
 Washington, D.C. 20231

REQUEST FOR RECONSIDERATION

The office action of June 4, 2003, has been reviewed and its contents carefully noted. Applicants thank the Examiner for the telephone interview granted today, and in view of the productive discussion in that interview hereby request reconsideration of this case. Claims 1, 3 and 5 through 14, as amended in response to the last office action, remain in this case. Claims 1 and 8 are independent, with claim 1 covering creating the product comparison system and parallel claim 8 covering providing comparisons to customers.

As was discussed in the interview today, the novel method of Applicants' invention is a method for providing product comparisons in a natural language form by combining generic phrases with feature text snippets for individual features and user profile text snippets for user profiles to generate a display comprising a comparison guide for the products featuring dynamically generated fluent text that is used to convey product analyses and recommendations tailored to the user requirements and preferences.

CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being transmitted by facsimile to the United States Patent and Trademark Office at 703-746-5627 on July 16, 2003.



Michael F. Brown

Feature text snippets are defined and explained in the specification as filed on page 8, line 15, through page 9, line 14. User profile text snippets are defined and explained on page 10, line 12, through page 11, line 3. How the text snippets are combined with generic text is explained from page 11, line 13, through page 13, line 22. Examples of how feature text snippets and user text snippets and generic text phrases are combined into fluent natural language text paragraphs are provided on pages 11, line 21 through 12, line 5.

As defined in the claims and explained in the specification, the novelty of the present invention is that it is a method which provides *natural language fluent text in the form of paragraphs of written words* generated by the *combination of the generic phrases and snippets*, rather than the tabular spreadsheet-like display of features and prices, etc., common to the prior art. The discussion of the prior art in page 2 of the specification, lines 11-18, makes this distinction.

It is clear from the specification that the inventors have used the phrases "natural language" and "fluent text" to mean this kind of human-like flowing verbiage with appropriate grammatical and rhetorical structure in a convincing fashion (see, for example, the instructions on page 12 of the specification as filed, or the first and last paragraphs of the summary of the invention).

In the claims, the novel method of the invention is claimed as developing feature text snippets and user profile text snippets (claim 1(a) and (b), claim 8(a)(i) and (ii)) (defined in the claims as "phrases to be used when describing or referring to particular (features or user profiles)") and providing generic phrases (claim 1(c) first line, claim 8(a)(iii)). The feature text snippets and user profile snippets are combined with the generic phrases to produce a comparison guide featuring dynamically generated fluent text (claim 1(c), claim 3(d)). (Claim 8 adds additional steps of communicating with the user and ranking products, but these are common to any product recommendation system)

Neither Shaya nor Guheen, nor the combination of the references, teaches or suggests this novel method. The Shaya application details a method of generating product recommendations using a neural network to determine its recommendations. In contrast to the Applicants' invention, in the Shaya method there are no generic phrases, no feature text snippets, no user text

snippets, and no combination of these into dynamically generated fluent text used to convey product analyses and recommendations tailored to the user requirements and preferences. Instead, Shaya presents its recommendations in tabular form - see figures 8a-b and 9a-b for examples of Shaya's output. In paragraph 112, Shaya says, "Another form of ancillary information output comprises explanations of why certain products were recommended. For example, performance prediction metrics may be explained by querying the invention with a radio button or other appropriate interface and the invention could respond by providing a table of concern areas ordered by the consumer's importance and/or performance scores for the particular product being considered for each area of concern." In other words, the method of Shaya performs a ranking to produce output which is tabular, it does not perform the steps of Applicant's method to produce natural language or fluent text as the phrase is used by the inventors herein.

Guheen presents a description of a product comparison system in its discussion of figure 66 (column 174), among many other applications of a method for conveying redundancies and omissions among components of a network framework. The description is very general, and mentions that "features may be listed" and "data, i.e. specifications, details, etc., relating to the products and services are displayed along with a comparison between different products and services." (col. 174, lines 26-29) The flowchart of figure 66 is no more detailed, and just indicates that data relating to user requirements are received, and recommendations are output based on the data. It is not explained what method is used to generate the display, other than that data and comparisons are provided - nothing would teach or suggest the combination of snippets and generic text into natural language fluent text.

As discussed in the interview today, if Examiner believes the phraseology chosen in the claims does not accurately describe the novel method of the invention, the Applicants are willing to further amend the claims to satisfy the Examiner.

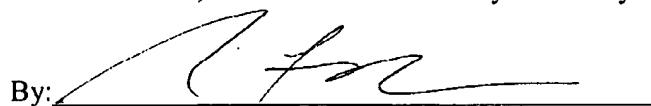
Conclusion

Applicant believes the claims, as amended, are patentable over the prior art, and that this case is now in condition for allowance of all claims therein. Such action is thus respectfully requested. If the Examiner disagrees, or believes for any other reason that direct contact with

Applicants' attorney would advance the prosecution of the case to finality, he is invited to telephone the undersigned at the number given below.

"Recognizing that Internet communications are not secured, I hereby authorize the PTO to communicate with me concerning any subject matter of this application by electronic mail. I understand that a copy of these communications will be made of record in the application file."

Respectfully Submitted:
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